

**APPENDIX 17a**

**LOCAL EDUCATION AUTHORITY REPORT – RESPONSE TO ALFREDSON YORK  
REPORT**

**Response to Alfredson York Associates Education Impact Statement contesting Developer Contribution for Education for Former B&Q site dated 11<sup>th</sup> November 2020.**

**Paragraph reference numbers below refer to the paragraph numbers in the Alfredson York Associates Education Impact Statement.**

**Primary Schools**

At paragraph 3.4.2 the report suggests including primary schools within a 2 mile straight line distance of the site, however, in Trafford Council's developer contribution calculation dated 27<sup>th</sup> May 2021 only schools within a 2 mile walking distance of the site have been included. This is the radius that is normally used for primary schools as the Government's statutory walking distance for Reception children which is the year of entry for Primary Schools, is 2 miles. This is more realistic when it comes to parental choice and more appropriate in terms of planning for school places. Therefore, two schools in table 3.5.1 that are further than 2 miles walking distance; St Hugh of Lincoln RC Primary (2.4 miles) and Barton Clough Primary (2.6 miles) should be excluded from the assessment.

In table 3.5.1 Surplus places is calculated by comparing the Net Capacity with the Number on Roll however it would be more realistic to compare the total Published Admission Number (PAN) (PAN x no. of year groups) with the Number on Roll, as many schools historically have been admitting more pupils than their net capacity suggests and most schools admit multiples of 30 as a form of entry whereas net capacity figures are sometimes not multiples of 30. Table 3.5.1 Net Capacity was compared to Trafford's May 2019 Net Capacity figures, however, there are many discrepancies (highlighted) resulting in incorrect surplus place figures. See Trafford Council figures compared with table 3.5.1 below. Where the appellant's totals are incorrect the red figures show correct totals.

School	Table 3.5.1			Trafford Council figures				
	Net Capacity (PAN)	Number on Roll (NOR)	Surplus Places (Net Cap - NOR)	Net Cap 2019	Total PAN 2019	NOR Jan 2020	(a) Surplus Places (Net Cap - NOR)	(b) Surplus Places (Total PAN - NOR)
Gorse Hill Primary School	343 (60)	362	0	350	420	362	0	58
Kings Road Primary School	744 (90)	605	139	630	630	605	25	25
Moss Park Junior School	240 (60)	254	0	233	240	254	0	0
Moss Park Infant School	232 (60)	178	54	172	180	178	0	2
Seymour Park Community Primary	560 (84)	588	0	588	588	588	0	0
Victoria Park Junior School	240 (60)	253	0	199	240	253	0	0
Victoria Park Infant School	232 (60)	180	52	169	180	180	0	0
St Matthew's CofE Primary School	235 (30)	201	34	210	210	201	9	9
St Hugh of Lincoln RC Primary School	315 (45)	312	3	315	315	312	3	3
St Teresa's RC Primary School	210 (30)	206	4	210	210	196	14	14
St Alphonsus RC Primary School	200 (30)	184	16	210	210	184	26	26
St Ann's RC Primary School	463 (60)	420	43	379	420	420	0	0
Old Trafford Community Academy	420 (60)	390	30	380	420	390	0	30
Barton Clough Primary School	210 (30)	184	26	210	210	184	26	26
St Hilda's CofE Primary School	341 (45)	246	95	315	315	246	69	69
Totals	4995(729) 4985 (804)	4990 4563	496	4045	4263 (729)	4057	143	233
Surplus place as % of Total Net Capacity			9.93% 9.95%				3.54%	
Surplus place as % of Total PAN			10.36%					5.47%

In the Trafford Council figures, the total net capacity reads 4045, Total PAN 4263 and the total surplus places 143 or 233 depending on what parameters are compared to calculate the surplus places i.e. the difference between (a) Surplus Places (Net Cap - NOR) and (b) Surplus Places (Total PAN - NOR), these totals exclude St Hugh of Lincoln and Barton Clough Primary Schools. This gives a total surplus places as a percentage of Net Capacity as 3.5% not the 9.93% stated in the report in paragraph 3.5.4. This sits below the operating surplus range of 5-10%. The Council calculates surplus places by comparing the Total PAN with the NOR, column (b) which gives a slightly higher figure of 5.5%. This is more realistic than comparing the Net Capacity with NOR as the PAN is usually a multiple of 30 and reflects the historical entry pattern of a school. The Education Team at Trafford Council use an operating surplus of 5-10% needed to allow for fluctuations in demand and parental choice. This equates to 3-6 places per year group (60) in a 2 form entry (420 place) school. Given the need to allow for an operating surplus number of school places to allow for fluctuations in demand and parental choice, it is not appropriate to use these surplus places for meeting demand generated by new residential development.

In paragraph 3.5.5 the report states that there is a discrepancy between the net capacity and the school's PAN, what the appellant refers to here is the total PAN (PAN x no. of year groups). There is sometimes a discrepancy between Net Capacity and total PAN because the Net Capacity is calculated using the Department for Education's Net Capacity assessment method - designed to provide a single robust and consistent method of assessing the net capacity of maintained schools and, for primary schools, is based on the number and size of spaces designated as classbases. The PAN is based on the number of pupils admitted in each year group. Six schools in the above Trafford Council figures have a lower Net Capacity compared to the Total PAN indicating small classrooms, another reason for not overcrowding the school.

In 3.5.5 the consultants have multiplied 729 by 7 year groups, however, the total of PAN's is 804 and the consultants have failed to adjust for the infant and junior schools (Moss Park and Victoria Park) which have 3 and 4 year groups respectively. So there are not 5103 places available, there are 4263 (when St Hugh of Lincoln and Barton Clough have been discounted).

In table 3.6.2 the PAN is incorrectly totalled and should read 684 and when Barton Clough and St Hugh of Lincoln are omitted, as they should be, the figure should read 609. Similarly, the Year R allocation should read 592 or 518 when the above two schools are omitted. This reduces the available places to 91.

School	YR PAN	Year R allocation (FOIR)	Available Places
Gorse Hill Primary School	60	42	18
Kings Road Primary School	90	63	27
Moss Park Junior School			
Moss Park Infant School	60	60	0
Seymour Park Community Primary	84	84	0
Victoria Park Junior School			
Victoria Park Infant School	60	60	0
St Matthew's CofE Primary School	30	30	0
St Hugh of Lincoln RC Primary School	45	45	0
St Teresa's RC Primary School	30	27	3
St Alphonsus RC Primary School	30	26	4
St Ann's RC Primary School	60	55	5
Old Trafford Community Academy	60	42	18
Barton Clough Primary School	30	29	1
St Hilda's CofE Primary School	45	29	16
<b>Totals</b>	<b>684</b>	<b>592</b>	<b>92</b>
<b>Less two shaded schools</b>	<b>609</b>	<b>518</b>	<b>91</b>

Paragraph 3.6.3 Should read 609 places available of which 91 were unfilled giving a percentage of 14.9%. This is higher than the 12.62% stated based on revised totals from the table 3.6.2 after discounting St Hugh of Lincoln and Barton Clough Primary Schools. This looks high compared to the percentage across all year groups (5.5%) because the number of applications this year is unusually low. This could be due to a low birth year or families have held back on sending their child to school because of the covid risk. However, these vacancies are now filling up through in-year applications.

In fact in-year applications are having a significant effect in several of the planning areas in Trafford for Sept 2021. 606 in-year applications were received for primary places in the 12 week period between 3 May and 15 July 2021. Of these 419 (69%) were newly resident in Trafford, of which 254 (42%) were from abroad, of which 188 (31%) were from Hong Kong. This is in addition to the 237 applicants from Hong Kong reported to the DfE as at 30 April 2021, making Trafford the LA who has welcomed the highest number of school applicants from Hong Kong. The 606 in-year applications received between 3 May and 15 July is more than double the usual number of applications received in this time period and resulted in us having to close our in-year application system in order to allow time to process everything received to date. The system is due to re-open on 1 September and it is expected that this surge will continue into the autumn term. The LA is working closely with DfE to develop solutions.

In-year applications are particularly high in the Junior year groups as parents move in to the area in time to sit the Grammar school entrance exams. So even if Reception applications are down, by the end of the primary phase, year groups have filled to capacity.

Paragraph 3.7.5 refers to table of births data in the Gorse Hill and Longford areas. Birth figures assume there is no change in demand in the 4 years leading up to school age and does not consider families that move in to the area in time to apply for a school place. Birth figures will differ from GP data which is used by the Trafford Admissions team in order to forecast future demand for school places. GP data will capture families that move into an area after the birth of their child.

The statement in paragraph 3.7.6 assumes that people do not move and stay where they are born. Stretford has the most transient population with the highest rates of inward and outward migration

out of all the Trafford planning areas. Therefore the picture in Stretford is constantly changing and it cannot be assumed that number of surplus places is likely to increase.

## Secondary Schools

In table 3.8.1 the net capacity for Secondary Schools includes the 6th form which should be excluded for the purposes of capacity for years 7-11. There is not a shortage of places in the 6<sup>th</sup> form sector in Trafford therefore if these places are included they will skew the figures for the 11-16 year groups where there is a shortage of places, therefore these year groups should be excluded. The table below shows table 3.8.1 together with Trafford Council figures excluding the 6<sup>th</sup> forms.

School	Table 3.8.1			Trafford Council figures					
	Net Capacity	Number on Roll (NOR)	Surplus Places	Net Capacity 2019	Net Cap 2019 (exc. 6th form)	Total PAN 2019 (exc 6th form)	NOR Oct 2019 (exc 6th form)	(a) Surplus Places (Net Cap - NOR)	(b) Surplus Places (Tot PAN - NOR)
Lostock High School (11-16)	740	328	412	726	726	740	339	387	401
Stretford Grammar School	798	853	0	829	640	640	735	0	0
Stretford High School (11-16)	825	913	0	973	973	950	914	59	36
Sale High School (11-16)	1050	841	209	1022	1022	1050	856	166	194
Urmston Grammar Academy	1000	1043	0	1097	847	750	783	64	0
Sale Grammar School	1341	1301	40	1341	981	900	954	27	0
St Antony's Roman Catholic School, a Voluntary Academy (11-16)	650			661	661	650	560	101	90
Totals	5754	5279	661	6649	5850	5680	5141	804	721

The Government's statutory walking distance for secondary age pupils is 3 miles therefore the greyed out schools in the above table haven't been considered in the Developer contribution calculation dated May 2021 as they are over 3.5 miles walking distance away from the development site. However, if they were to be included – as they are all accessible by public transport then the Trafford Council figures in the above table shows their surplus places without inclusion of the 6<sup>th</sup> forms.

Paragraph 3.8.3 states that there are 661 surplus secondary places within 3 miles of the former B&Q site but Trafford Council's developer contribution calculator states that there are 536 current vacancies, the majority of which are at Lostock School. The discrepancy lies in the inclusion of Sale High School. This school is becoming more popular so the number of surplus places in May 2021 has reduced by 40% to 116. If this trend continues then there will not be any surplus places in two years' time.

Trafford Council figures shows two possible surplus place scenarios, (a) when Net Capacity is compared to NOR and (b) when Total PAN is compared to NOR. There are more surplus places (804) when Net Capacity is compared with NOR. This is because secondary schools sometimes set their PAN's at an operational level based on corridor width etc which gives a lower total PAN than the capacity of the school. Trafford Council calculate surplus places by comparing the total PAN with the NOR as this is more realistic and in line with the school's operating PAN.

Paragraph 3.8.4 calculates the surplus places as a percentage of capacity at 11.49%, however it excludes St Antony's RC School, which is closer to the development site than the 3 greyed out schools. Based on the 4 closest secondary schools (within 3 miles walking distance) the total surplus based on the secondary school Total PAN is 18% (527/2980), however, if a 10% operational surplus is kept at Lostock (74) together with the surplus at Stretford High (36) and St Antony's (90). Then the total surplus is 200/2980 = 6.7%. This is within the operation surplus margin retained by Trafford Council to allow for fluctuations in demand and parental choice. The remaining 327 places at Lostock have already been allocated to other developments in Stretford (Pomona Docks and Kelloggs) so cannot be used again.

3.9.3 This calculation is flawed as it does not include all secondary schools in these 3 areas; namely, Ashton on Mersey School, Flixton Academy and Wellacre Academy. The January 2020 Year 7 forecast shows 8319 students and the NOR for October 2019/Jan 2020 across all 10 schools is 7989 students. This shows the actual number of students is 330 lower than the forecast for Jan 2020. The current total number of places across the 10 schools is 8750 implying a 3.8% surplus across the 3 planning areas. This is below the operational surplus 5-10% required to allow for fluctuations in demand and parental choice. See table below which includes the missing schools.

All Secondary Schools in Sale, Urmston and Stretford Planning Areas	Total PAN 2019 (exc 6th form)	NOR Oct 2019 (exc 6th form)
Lostock High School (11-16)	740	339
Stretford Grammar School	640	735
Stretford High School (11-16)	950	914
Sale High School (11-16)	1050	856
Urmston Grammar Academy	750	783
Sale Grammar School	900	954
St Antony's Roman Catholic School, a Voluntary Academy (11-16)	650	560
<b>Total</b>	<b>5680</b>	<b>5141</b>
Flixton Girls	900	944
Wellacre Boys	900	618
Ashton on Mersey	1270	1286
<b>Revised totals</b>	<b>8750</b>	<b>7989</b>

If the calculation in paragraph 3.9.4 included the places at the 3 remaining schools when considering the 3 secondary planning areas of Sale, Stretford and Urmston, then using the proportional approach the forecast for Jan 2026 is 8465. [Calculation: 7989/8319 x 8851]. If the number of places across the 10 schools remains the same for the next 5 years then the % surplus will reduce to 3.3%. This is not sustainable and shows the need for further secondary school places.

### **Impact and Mitigation regarding Primary and Secondary Education**

Paragraph 4.2.3 refers to significant number of places in the reception year group, however, these places are later filled by in year applications and the percentage of surplus places over total places in the Primary Schools is 5.5% which is needed as an operational margin to allow for in year admissions and parental choice, this cannot be classed as surplus places or offset by developers.

This study does not take into account migration and the fact that many families move into Trafford the year before primary and secondary school applications are made.

Sept 2020 is a lowest application round for a while - Covid could have an impact as some families were reluctant to send their children to school, however the admissions round for Sept 2021 has seen a sharp rise in in-year applications which threaten to lead to a shortage of places especially in Junior year groups.

Paragraph 4.2.5 The Admissions team do not use Birth Rates but instead use GP numbers as this includes families that have moved into the area with school age children.

In paragraph 4.2.7 Alfredson York Associates suggests that spare places in neighbouring local authority areas should be taken into account, however, Trafford Council does not collect surplus place information from other local authorities therefore cannot include them in our developer contribution calculation. Ultimately parental choice drives demand for school places and if families are residing in Trafford and request a school place in Trafford then the Council must supply sufficient suitable places. Once out of borough pupils have secured a place at a Trafford School, we cannot remove them, however as the increasing number of Trafford residents apply for school places in the normal admissions round then there will be fewer places for pupils from outside the borough. Furthermore, existing Trafford residents should not be required to seek school places outside the borough because developers have failed to mitigate the impact of their schemes by providing developer contributions to assist in the provision of new school places in the borough.

In paragraph 4.2.9 The Consultants refer to Trafford Council not seeking a contribution for Secondary school places, however, the Education team have sought secondary school contributions ever since the surplus places at Lostock, have been allocated to large developments in Stretford, namely; Pomona Docks and Kellogg's site. The revised developer contribution calculation dated May 2021 shows increased rates per pupil based on the 2019 DfE School Places Scorecard, as this is the recommended rate as outlined in paragraph 1.5.5 based on the following DfE guidance - [Securing Developer Contributions for Education Nov 2019](#).

Paragraph 4.2.9 also refers to the capacity of a recently opened school. It is not clear whether consultants are referring to North Cestrian or St Antonys RC High School which has recently become an Academy. North Cestrian is in Altrincham and is currently full and admitting above their PAN of 125. St Antony's has already been captured in the secondary table. It is currently also admitting above its PAN of 130 and only has 59 surplus places in upper year groups.

The education team at Trafford are still asking for a contribution at secondary level because the surplus places at Lostock have already been allocated to other large developments in the Stretford area.

## Conclusion

Trafford Council has a statutory duty to ensure that sufficient places are available for every school age child resident within the borough. The education team carry out this function by annually forecasting pupil numbers and measuring the Net Capacity of all maintained schools. This helps to indicate the admission number of each school. Schools then set their PANs accordingly.

Pupil forecasts and net capacity data is submitted annually to the Department for Education who calculate the Basic Need funding required to provide new school places. However this funding does not include the pupil yield generated from new housing developments.

### **Local Authorities are expected to seek developer contributions towards new school places generated by a housing development.**

For the former B&Q site, the education team at Trafford Council have calculated a contribution of £1,461,415 to provide 47 Primary places and 33 Secondary places - see Developer Contribution calculation dated 27<sup>th</sup> May 2021.

This document looks at Primary Schools within a 2 mile walking distance and Secondary Schools within a 3 mile walking distance of the site and compares the number on roll with total PAN. The percentage surplus places is then calculated. The Council require an operating surplus of 5-10% in order to allow for fluctuations in demand and parental choice. When the percentage surplus is above 10% then there are a number of places available for developers use.

For Primary schools the percentage surplus was calculated at 5.5% therefore there are no places available for developer use and the full primary contribution of £739,639 is sought.

For Secondary schools the percentage surplus was calculated at 18%. This left 335 places available for developer use, however these places have already been assigned to large developments in the Stretford area, namely, Pomona Docks and the Kelloggs sites. Therefore the full secondary contribution of £721,776 is expected.

The total contribution for this development is £1,461,415.